

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 13
	:	
Robin Lynn Busby,	:	
Debtor	:	NO. 20-10520-amc

ORDER

AND NOW, this day of _____ 2022, upon consideration of the Debtor's Motion to Reopen the above case, and any response thereto, it is hereby ORDERED AND DECREED that this case should be reopened.

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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	:	
Robin Lynn Busby,	:	
Debtor	:	NO. 20-10520-amc

DEBTOR'S MOTION TO REOPEN CASE

Robin L. Busby, through her undersigned counsel, Paul A. R. Stewart, Esquire, hereby moves the Court to reopen the above-captioned case and in support thereof avers as follows:

1. Robin L. Busby filed a Voluntary Petition under Chapter 13 of the U.S. Bankruptcy Code on January 28, 2020. The Debtor is represented by Paul A.R. Stewart, Esquire.
2. William C. Miller was duly appointed as the Trustee for this Chapter 13 case and terminated on October 1, 2021.
3. Kenneth E. West was duly appointed as the Trustee for this Chapter 13 case on October 1, 2021.
3. The Meeting of Creditors for the Debtor was held on May 13, 2020.
4. A discharge of the Debtor was entered on August 5, 2021.
5. Despite receiving notice of the Debtor's bankruptcy filing and Order for Discharge, former creditor SMS Financial JDC continued, post-petition, and post discharge to create, perfect or enforce a lien on debtor's principal residence.
6. Despite knowledge of Order for Discharge, SMS directed Trident Land Transfer (Title) Company to make payment upon sale of property an amount in excess of \$101,825.
7. Trident Land Transfer made this payment despite direct knowledge of the Order of Discharge and instructions from Debtor Counsel to withhold payment.

8. The Debtor respectfully requests that the case be reopened in order to file a complaint for violation of the automatic stay and discharge injunction.

WHEREFORE, Debtor, Robin Busby, asks this Honorable Court to enter an Order reopening this case in order to file a complaint for violation of the automatic stay and injunction relief and for such other and further relief as the Court deems just and appropriate.

Dated: January 3, 2022

Respectfully Submitted,

/S/ Paul A.R. Stewart, Esquire
Helm Legal Services LLC
Paul A.R. Stewart, Esquire
Attorney for Debtor
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Suite 140
Wynnewood, Pennsylvania 19096
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Reopen Case was served on January 3, 2022 by means of the Court's CM/ECF system or via first class mail, postage prepaid, upon the following:

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Kenneth E. West, Esquire (Trustee)
Office of the Chapter 13 Trustee
1234 MARKET STREET, SUITE 1813
PHILADELPHIA, PA 19107

/S/ Paul A.R. Stewart, Esquire
Legal Helm, LLC
Paul A.R. Stewart, Esquire
Attorney for Debtor